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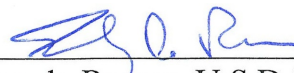
MEMO ENDORSED

April 17, 2020

VIA ECF

The Honorable Edgardo Ramos
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10004

The application is GRANTED. A final pre-trial conference will be held on April 29, 2021, at 2:30 PM.



Edgardo Ramos, U.S.D.J.
Dated: April 17, 2020
New York, New York

Re: *United States v. Frank Brandon, et al.*
Criminal Docket No. 19-79 (ER)

Dear Judge Ramos:

I am writing on behalf of the parties to follow up on the telephone conference held with Your Honor on April 14, 2020 during which the trial of the above-captioned matter was adjourned to May 3, 2021.

In light of the new trial date, the parties jointly propose the following schedule for pre-trial matters:

1. The Government will provide the defense with its letter seeking to admit evidence pursuant to FRE 404(b) by October 6, 2020;
2. The parties will file motions *in limine*, voir dire requests, proposed jury instructions and a proposed verdict sheet by April 2, 2021;
3. Responses to motions *in limine*, and objections to proposed voir dire, jury instructions and verdict sheet will be filed by April 16, 2021;
4. The Government will produce Rule 3500 material to the defense “for attorney’s eyes only” on April 2, 2021;
5. Rule 3500 material can be shown to the defendant on April 26, 2021;
6. A final pretrial conference will be held at a date and time during the week of April 26, 2021 convenient to the Court and the parties.

Hon. Edgardo Ramos

April 17, 2020

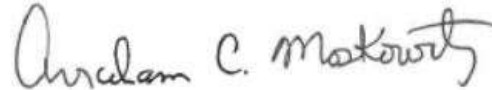
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7. Trial will commence on May 3, 2021.
8. The parties respectfully request that the time between February 18, 2021 up to May 3, 2021 be excluded from the provisions of the Speedy Trial Act to allow the parties to prepare for trial.

If the proposed schedule is acceptable to the Court, please endorse the letter and file the endorsed letter on ECF.

Thank you in advance for your consideration of this request.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Avraham C. Moskowitz". The signature is fluid and cursive, with the first name "Avraham" being more prominent.

Avraham C. Moskowitz

ACM:bgb

cc: AUSA Dominic Gentile (via e-mail)
Jeremy Schneider, Esq. (via e-mail)